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November 14, 2022

The Honorable Tony N. Leung
Magistrate Judge, District of Minnesota
United States District Court
300 S. 4th St.
Minneapolis, MN 55415

VIA ECF ONLY

Re: United States of America v. Abdiaziz Shafii Farah, 22-CR-124(1)

Good morning Your Honor and Chambers Staff:

I write to request this Court issue a ruling on the Motion for a Protective Order before this Court (as articulated and discussed in ECF No.s 151, 157, and 158).

The government has represented it will not provide discovery in this case to defense counsel until a protective order is issued but will provide discovery promptly after one is issued. Mr. Farah is detained in jail pending trial and has made a speedy trial demand. He thus wishes to do everything possible to ensure the case is handled as expeditiously as reasonably possible.

The government has represented in its filings that “discovery will total several millions of pages of documents.” In its proposed case management schedule, the government suggested that, after it provides discovery, the Court Order the defendants in the case have 120 days to file pretrial motions. (ECF No. 160). Mr. Farah and one codefendant proposed a quicker schedule (ECF No.s 155, 156). Other codefendants proposed this Court hold a scheduling conference. (ECF No. 159). Mr. Farah respectfully submits that, regardless of the schedule this Court ultimately sets, his constitutional rights are best protected by this Court granting the Motion for a Protective Order and issuing an Order so that he and counsel can begin reviewing the millions of pages of documents at issue.

Mr. Farah emphasizes the time he is spending in jail as a presumptively innocent citizen prejudices him greatly, and the discovery provision process being handled as quickly as possible hopefully helps protect his constitutional rights. Mr. Farah submits that the Court issuing such an Order prejudices no party but helps protect his rights. He thus respectfully requests the Court act accordingly.

Thank you very much for your consideration.

Respectfully,

/s/ Ian S. Birrell
Ian S. Birrell